

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
CHARLES MCLAURIN	:	VIOLATIONS:
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft - 3 counts)
	:	18 U.S.C. § 1029(a)(2) (access device
	:	fraud - 3 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

In or about June 2005, in the Eastern District of Pennsylvania and elsewhere,
defendant

CHARLES MCLAURIN

knowingly and without lawful authority transferred and possessed a means of identification of another person, that is, the name of C.H., and a Citibank Credit Card with an account number ending in the last four digits 7045, during and in relation to an access device fraud.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From in or about June 2005 through in or about April 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

CHARLES MCLAURIN

knowingly and without lawful authority transferred and possessed a means of identification of another person, that is, the name of C.H., and a HSBC Visa Credit Card with an account number ending in the last four digits 6407, during and in relation to access device fraud.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From in or about June 2005 through in or about May 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

CHARLES MCLAURIN

knowingly and without lawful authority transferred and possessed a means of identification of another person, that is, the name of C.H., and Bank of America credit card account number ending in the last four digits 4798, during and in relation to access device fraud.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

In or about June 2005, in the Eastern District of Pennsylvania and elsewhere,
defendant

CHARLES MCLAURIN

knowingly and with intent to defraud used, and aided and abetted and willfully caused the use of,
an unauthorized access device, that is, a Citibank credit card in the name of C.H., to obtain things
of value aggregating \$1,000 or more during a one-year period, for a total of approximately
\$2,495, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

From in or about June 2005 through in or about April 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

CHARLES MCLAURIN

knowingly and with intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a HSBC credit card in the name of C.H., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$3,500, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

From in or about June 2005 through in or about May 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

CHARLES MCLAURIN

knowingly and with intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a Bank of America credit card in the name of C.H., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$2,700 thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1028A and 1029(a)(2), as charged in this indictment, defendant

CHARLES McLAURIN

shall forfeit to the United States any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to the sum of \$12,428.

2. If any of the property subject to forfeiture as a result of any act or omissions of the defendant:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;

4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described above.

In violation of Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**